

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

LOCAL, 8027 AFT-NEW HAMPSHIRE,
AFL-CIO, et al.,

Plaintiffs,

V.

Case No. 1:21-cv-1077-PB

FRANK EDELBLUT, in his official capacity only as the Commissioner of the New Hampshire Department of Education, et al.,

Defendants.

ASSENTED-TO MOTION TO EXTEND BRIEFING SCHEDULE

The defendants, through counsel, submit this assented-to motion to extend the current summary judgment briefing schedule:

1. Under the current schedule, the parties' cross-motions for summary judgment are due on August 7, 2023, and their simultaneous objections are due on September 11, 2023.
2. The defendants require a brief extension of the summary judgment deadline due to defense counsel's competing litigation obligations and because of a minor family medical situation that required one of the defendant's attorneys to be away from the office.
3. The parties have conferred and agree to continue the deadline for cross-motions for summary judgment by one week to **August 14, 2023**. The parties further agree to continue the deadline for simultaneous objections by one week to **September 18, 2023**.
4. A Civil Form 3 reflecting these changes is attached hereto.

5. The requested extension will not result in the continuance of any hearing, conference, or trial. LR 7.2(a).

6. No memorandum accompanies this motion because the reasons for the requested relief are all stated above. LR 7.1(a)(1).

WHEREFORE, the defendants respectfully request that this Honorable Court:

- A. Extend the deadline for cross-motions for summary judgment to **August 14, 2023**;
- B. Extend the deadline for simultaneous objections to **September 18, 2023**; and
- C. Grant such other relief as the Court deems just and equitable.

Respectfully submitted,

FRANK EDELBLUT, in his official capacity
as Commissioner of the Department of
Education,

JOHN M. FORMELLA, in his
official capacity only as Attorney General
of the State of New Hampshire,

AHNI MALACHI, in her official capacity as
Executive Director of the Commission for
Human Rights,

CHRISTIAN KIM, in his official capacity as
Chair of the Commission for Human Rights,

and

KENNETH MERRIFIELD, in his official
capacity as Commissioner of the Department of
Labor

By their attorney,

JOHN M. FORMELLA
ATTORNEY GENERAL

Date: August 7, 2023

/s/ Samuel Garland
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Certificate of Service

I hereby certify that a copy of the foregoing was served on all counsel of recording using the Court's electronic-filing service.

/s/ Samuel Garland
Samuel R.V. Garland